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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM THE SOUTH CAROLINA
WORKERS' COMPENSATION COMMISSION

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OCT 08 2020
SC Court of Appeals

Appellate Case No.: 2020-000723

Frederick Nelson, Employee, Respondent,

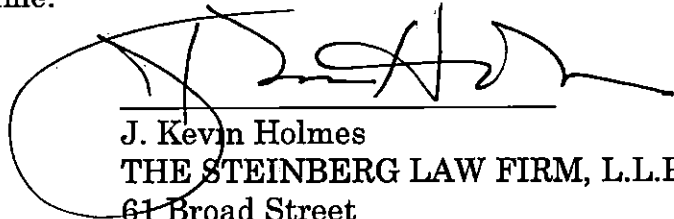
v.

City of North Charleston, Employer
And Carrier, Appellants.

MOTION TO FILE FINAL BRIEF OF RESPONDENT OUT OF TIME

The Respondent hereby moves to file the Final Brief of Respondent out of time. This motion is based on the grounds the Initial Brief of Respondent and additional designations of matters to be included in the Record on Appeal were timely filed by the undersigned on August 5, 2020. The Record on Appeal was electronically served on Malcolm M. Crosland, Jr., on August 13, 2020. The undersigned was not copied on the filing or service of Record on Appeal or Appellant's Final Brief. Respondent's Final Brief was due on August 23, 2020. The Clerk advised Malcolm M. Crosland, Jr., of the filing deficiency on September 30, 2020. Respondent's Final Brief was served and

filed electronically on October 1, 2020. A Certificate of compliance with Rule 211(a), SCACR, is being filed with this motion. Wherefore, the Respondent moves to be allowed to file his Final Brief out of time.

A handwritten signature in black ink, appearing to read 'J. Holmes', is written over a horizontal line. The signature is stylized and somewhat cursive.

J. Kevin Holmes
THE STEINBERG LAW FIRM, L.L.P.
61 Broad Street
Post Office Box 9
Charleston, South Carolina 29402

Charleston, South Carolina

October 5, 2020

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Frederick Nelson, Employee, Respondent,

v.

City of North Charleston, Employer
And Carrier, Appellants.

PROOF OF SERVICE

I hereby certify I have served a copy of the Rule 211 (a), SC ACR certificate and Respondent's Motion to File Final Brief of Respondent Out of Time on opposing counsel of record, Johnnie W. Baxley, Willson Jones Carter & Baxley, PA by depositing a copy in the United States mail, postage prepaid addressed to him at his address of record 421 Wando Park Boulevard, Suite 100, Mount Pleasant, SC 29464.

Glenis M. Haynes
Glenis M. Haynes
Paralegal to J. Kevin Holmes
THE STEINBERG LAW FIRM, L.L.P.
61 Broad Street
Post Office Box 9
Charleston, South Carolina 29402

Charleston, South Carolina
October 5, 2020

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FAX NO.:	(803) 734-1838			
FROM:	Glenia M. Haynes, Paralegal to J. Kevin Holmes, Esquire			
DATE:	October 5, 2020			
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FIRM: Clerk of Court, SC Court of Appeals
FAX NO.: (803) 734-1839
FROM: Glenis M. Haynes, Paralegal to J. Kevin Holmes, Esquire
DATE: October 5, 2020
RE: Frederick Nelson v. City of North Charleston
Appellate Case No.: 2020-00723
Motion for Leave to File Final Brief Out of Time

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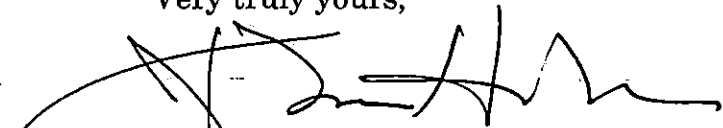
Re: *Fredrick Nelson v. City of North Charleston*
Appellate Case No.: 2020-000723

Dear Ms. Kitchings,

Enclosed for filing please find a Rule 211 (a), SC ACR certificate together with a Motion for Leave to File Final Brief of Respondent out of Time, Proof of Service on opposing counsel, and a filing fee of \$50.00.

With kindest regards, I am

Very truly yours,



J. Kevin Holmes
Email: kholmes@steinberglawfirm.com
Direct Fax: (843) 722-1190

JKH/gmh
Enclosures
cc: Johnnie W. Baxley (via US Mail)

J. Kevin Holmes, Esquire



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